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10 Attorneys for James Roy Beadles, a SLF Fire Victim Claimant

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 In re) Case No. 19-30088 (DM)
15 PG&E CORPORATION,)
16 and) Chapter 11
17 PACIFIC GAS AND ELECTRIC) (Lead Case—Jointly Administered)
18 COMPANY)
19 Debtors) MOTION TO ALLOW/DEEM TIMELY
) LATE FILING OF PROOF OF CLAIM
) BY JAMES ROY BEADLES;
) MEMORANDUM OF POINTS AND
20 Affects:) AUTHORITIES; DECLARATION OF
21 <input type="checkbox"/> PG&E Corporation) JAMES ROY BEADLES
22 <input type="checkbox"/> Pacific Gas & Electric Company)
23 <input checked="" type="checkbox"/> Both Debtors) Date: August 25, 2020
) Time: 10:00 a.m. (Pacific)
) Place: Telephonic Appearances Only
24 * All papers shall be filed in the Lead) United States Bankruptcy
25 Case,) Court: Courtroom 17, 16th Floor
26 No. 19-30088 (DM).) San Francisco, CA 94102
)
) Objection Deadline: August 18, 2020

1 TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY COURT
2 JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED
3 PARTIES:

4 The Singleton Law Firm (“SLF”) and Marshack Hays LLP, together with several other firms,
5 represent thousands of victims (“SLF Claimants”) of the fires started by PG&E in 2015 (“Butte
6 Fire”), 2017 (the twenty fires generally referred to as the “North Bay” and “Wind Complex Fires”),
7 2018 (“Camp Fire”) and 2019 (“Kincade Fire” and “LaFayette Fire”).

8 SLF respectfully file this motion on behalf of James Roy Beadles, a SLF Fire Claimant,
9 (“Movant”) to deem timely a late filed proof of claim (“Motion”).

10 **I. Summary of Argument**

11 A proof of claim may be deemed timely upon a showing of excusable neglect and lack of
12 prejudice. In this case, due to a variety of stressors arising from the La Porte Fire, including issues
13 that persist through the filing of this Motion, Movant was unable to timely file his proof of claim.
14 Because there is no danger of prejudice to the Debtors as Debtors’ estates are solvent, and all
15 creditors stand to be paid, the Motion should be granted to allow this survivor to have his claim
16 deemed timely. This Court must determine whether to grant the Motion.

17 **II. Factual Background**

18 **A. Movant’s Claims Arising From La Porte Fire¹**

19 Creditor, James Roy Beadles (“JR” or “Movant”), is a survivor of the 2017 La Porte Fire. JR
20 has an interest in two pieces of property: (i) 7 Darby Road, Bangor, CA 95914 (“7 Darby Rd”); 6595
21 La Porte Road, Bangor, CA 95914 (“6595 La Porte Rd”). 6595 La Porte Rd is also known as 53
22 Darby Road, Bangor, CA 95914. 6595 La Porte Rd is 18 acres and 7 Darby Rd is 1 acre. The
23 properties are in close proximity.

24 7 Darby Road: After losing the home he resided in at 6595 La Porte Rd in a subsequent fire,
25 JR’s brother Travis Beadles (“Travis”) moved into 7 Darby Rd. While Travis timely retained SLF to
26

27
28 ¹ See, Declaration of James Roy Beadles, ¶¶8,10.

1 file a proof of claim² on his behalf, JR did not. Specifically, JR was unaware of the bar date let alone
2 his brother's retention of counsel.³ JR's home 7 Darby Road, where Travis is now living, is infested
3 with rats who are slowly destroying the home. The rats entered 7 Darby Road while fleeing from the
4 La Porte Fire, and all attempts to eradicate the rats have been unsuccessful.

5 6595 La Porte Rd: In July 2020, after speaking with another SLF Victim, Travis realized that
6 he and his brother may have claims related to 7 Darby Road, plus the additional property – 6595 La
7 Porte Road – to which end he immediately contacted SLF. Specifically, Travis informed SLF that he
8 held a 50% ownership interest in 6595 La Porte Road with JR. This was the first time SLF was made
9 aware that Travis had a brother. Upon further inquiry, SLF discovered that (i) Travis and JR's mother
10 ("Mom") left 6595 La Porte Road to both Travis and JR when she passed; (ii) 6595 La Porte Road
11 experienced significant tree damage during the La Porte Fire; and (iii) to facilitate the transfer of title
12 from Mom, JR filed a quit claim deed in his name making him the current legal owner of 6595 La
13 Porte Road.

14 Due to misunderstandings involving qualified compensable damages⁴ and lack of knowledge
15 of JR's existence, SLF did not receive information related to JR in order to to timely complete JR's
16 proof of claim. As such, no proof of claim was *timely* filed on behalf of JR.

17 On July 17, 2020, SLF filed claim number MNUOX27402[[CSLT#4025#CF]] on behalf of
18 Movant ("Subject Proof of Claim"). A true and correct copy of the Subject Proof of Claim is attached
19 to the Beadles Declaration as Exhibit "1."

20 Thus, SLF now brings Motion to have the Subject Proof of Claim deemed timely.

21 **B. Pertinent Bankruptcy Background**

22 On January 29, 2019, PG&E Corporation and Pacific Gas and Electric Company ("Debtors"
23 or "PG&E") commenced with the Court voluntary cases ("Chapter 11 Cases") under chapter 11 of the
24

25 ² Travis' claim was filed on August 19, 2019.

26 ³ At the time of the La Porte Fire, Travis lived in his home located at 6595 La Porte Road, Bangor, CA 95914 ("6595 La
27 Porte"). Some time after the La Porte Fire, the La Porte Property burned down in an unrelated incident. Subsequently,
28 Travis moved into 7 Darby Road. JR currently resides in nearby Oroville, CA. Travis has health issues ranging from
hearing difficulties to respiratory issues. Further, Travis' education is limited which make conducting legal matters
challenging. At the time Travis retained SLF, there was no mention of JR.

⁴ Travis was under the impression that only emotional damages and not physical damages were eligible for compensation.

1 United States Code (“Bankruptcy Code”). PG&E’s chapter 11 filings were necessitated by a
2 confluence of factors resulting from catastrophic fires that occurred in Northern California prior to
3 the Petition Date, and PG&E’s potential liabilities arising therefrom.

4 The deadline for filing proofs of claim with respect to any prepetition claim including, but not
5 limited to, all claims of Fire Claimants, Wildfire Subrogation Claimants, Governmental Units and
6 Customers, and for the avoidance of doubt, including all secured claims and priority claims, against
7 either of the Debtors was October 21, 2019 at 5:00 p.m. (“General Bar Date”).

8 The deadline for filing claims was extended to December 31, 2019 (“Extended Bar Date”),
9 solely for the benefit of any non-governmental Fire Claimants who did not filed Proofs of Claim by
10 the General Bar Date. *See*, Dk. No. 4672.

11 On January 31, 2020, as Dk. No. 5590, the Debtors filed an Amended Chapter 11 Plan
12 Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated January 31,
13 2020

14 On February 7, 2020, as Dk. No. 5700, the Debtors filed a Disclosure Statement for the
15 Amended Plan.

16 On February 19, 2020, as Dk. No. 5835, the Debtors filed Motion for Entry of an Order (I)
17 Approving Form and Manner of Notice of Hearing on Proposed Disclosure Statement; (II)
18 Establishing and Approving Plan Solicitation and Voting Procedures; (III) Approving Forms of
19 Ballots, Solicitation Packages, and Related Notices; and (IV) Granting Related Relief (the
20 “Solicitation Procedures Motion”).

21 On March 17, 2020, the Solicitations Procedures Motion was approved.

22 After filing multiple iterations of the plan, on June 19, 2020, as Dk. No 8048, the Debtors
23 filed an Amended Joint Chapter 1 Plan of Reorganization dated June 19, 2020 (“Final Plan”).

24 On June 20, 2020, post-voting and hotly contested confirmation hearings, the bankruptcy
25 court entered an order confirming the Final Plan.

26 **III. Legal Argument**

27 In a Chapter 11 case, the time to file a proof of claim may be extended under certain
28 circumstances. Fed. R. Bank. Pro. 3003(c)(3); Fed. R. Bank. Pro. 9006(b)(1). The bankruptcy court

1 has “broad equitable powers” in a Chapter 11 case with respect to the timing requirement for proofs
2 of claim. *Pioneer Inventory Services v. Brunswick Associates Limited Partnership*, 507 U.S. 380, 389
3 (1993). All in all, Rule 9006(b)(1) allows “late filings caused by inadvertence, mistake, or
4 carelessness, not just those caused by intervening circumstances beyond the party's control.” *Id.*, at
5 381. Even a creditor that did in fact receive notice may file a proof of claim notwithstanding the
6 expiration of a claims bar date in a Chapter 11 case upon a showing of “excusable neglect.” *Id.* at
7 394-95 (“Had respondents here been prevented from complying with the bar date by an act of God or
8 some other circumstance beyond their control, the Bankruptcy Court plainly would have been
9 permitted to find ‘excusable neglect’ [under FRBP 9006].”).

10 In considering whether a creditor’s failure was the product of “excusable neglect,” the court
11 should take “account of all relevant circumstances surrounding the party’s omission,” including “the
12 danger of prejudice to the debtor, the length of the delay and its potential impact on judicial
13 proceedings, the reason for the delay, including whether it was within the reasonable control of the
14 movant, and whether the movant acted in good faith.” *Id.* at 395; *see also Corning v. Corning (In re*
15 *Zilog, Inc.)*, 450 F.3d 996 (9th Cir. 2006) (noting *Pioneer*’s non-exhaustive list of relevant factors).
16 Again, a late-filed proof of claim is allowable where a creditor had actual notice of the bankruptcy
17 but, due to some external reason, failed to file a proof of claim or did not realize that she had to,
18 before the bar date. *See, e.g., ZiLOG, Inc. v. Corning (In re ZiLOG, Inc.)*, 450 F.3d 996, 1003-07 (9th
19 Cir. 2006) (applying the *Pioneer* factors). All in all, Rule 9006(b)(1) allows “late filings caused by
20 inadvertence, mistake, or carelessness, not just those caused by intervening circumstances beyond the
21 party's control.” *Pioneer*, 507 U.S. at 381. Here, consideration of all four *Pioneer* factors—as well as
22 a fifth engrafted onto the *Pioneer* analysis by some courts—weighs in favor of Movants.

23 Because in this case there is no danger of prejudice to the Debtors, the first *Pioneer* factor
24 weighs overwhelmingly in Movant’s favor. Debtors’ estates are solvent, and all creditors stand to be
25 paid. *See, e.g., In re Best Payphones, Inc.*, 523 B.R. 54, 75-6 (Bankr. S.D.N.Y. 2015) and *In re*
26 *Sheehan Mem’l Hosp.*, 507 B.R. 802, 803 (Bankr. W.D.N.Y. 2014) (where the chapter 11 estate is
27 solvent, “the proper remedy for a late filing is not the expungement of a claim, but its allowance as a
28 tardily filed claim only.). Secondly, immediately, upon receiving all the necessary information the

1 Subject Proof of Claim was filed. Thirdly, the delay in filing the Subject Proof of Claim is reasonable
2 considering immediately upon becoming aware that he may be compensated for damages suffered, a
3 proof of claim was filed by SLF on JR's behalf. Lastly, any prospect of prejudice beyond solvency is
4 unlikely given (a) distributions have not been made; and (b) the value of Movants' claims relative to
5 the value of Debtors' estates is low. *See, e.g., In re Keene Corp.*, 188 B.R. 903, 910 (Bankr. S.D.N.Y.
6 1995) (size of the late claim in relation to the estate is a consideration in determining prejudice).

7 **IV. Conclusion**

8 For the reasons set forth above, the Movant respectfully request that this Court enter an order
9 pursuant to Bankruptcy Rule 9006(b)(1) as follows:

- 10 1. Granting the Motion;
- 11 2. Finding that Subject Proof of Claim filed by Movant is to be allowed as having been
12 timely filed;
- 13 3. Granting such other or further relief as the Court deems just and proper.

14
15 Dated: July 23, 2020

MARSHACK HAYS LLP

/s/ Laila Masud

By:

RICHARD A. MARSHACK
LAILA MASUD
Attorneys for SLF CLAIMANTS

19
20 Dated: July 30, 2020

SINGLETON LAW FIRM, APC

By: /s/ Gerald Singleton

GERALD SINGLETON
GARY LOCURTO
Attorneys for the SINGLETON LAW
FIRM FIRE VICTIM CLAIMANTS

1 **Declaration of James Roy Beadles**

2 I, JAMES ROY BEADLES, say and declare as follows:

3 1. I am an individual over 18 years of age and competent to make this Declaration.

4 2. If called upon to do so, I could and would competently testify as to the facts set
5 forth in this Declaration.

6 3. The facts set forth below are true of my personal knowledge.

7 4. I am a survivor of the La Porte Fire that occurred in 2017 and I make this
8 Declaration in support of my Motion to Allow/Deem Timely Late Filing of Proof of Claim
9 ("Motion").

10 5. I was recently been informed that my brother Travis Beadles ("Travis") retained
11 Singleton Law Firm ("SLF") to represent him for damages arising from the La Porte Fire. Travis
12 has some hearing difficulties, a limited education and struggles with respiratory issues, which
13 make conducting legal matters challenging such that he did not mention to me that he had
14 retained counsel let alone the scope of retention. I have now retained Singleton Law Firm to
15 represent me in relating to damages I suffered as a result of the La Porte Fire.

16 6. At the time of the La Porte Fire, Travis resided at his home located at 6595 La
17 Porte Road, Bangor, CA 95914 ("6595 La Porte"). Some time after the La Porte Fire had been
18 extinguished, the La Porte Property burned down in an unrelated incident. Subsequently, Travis
19 moved into my home located at 7 Darby Road, Bangor, CA 95914 ("7 Darby Road").

20 7. I am informed and believe that at the time Travis signed a retainer with Singleton
21 Law Firm he did not mention me since Travis mistakenly understood that his only potential
22 damages were for emotional distress and that since he did not own the 7 Darby Road, he could not
23 make a claim for real property damages 7 Darby Road. It did not occur to him that I as the owner
24 of 7 Darby Road may have a claim for real property damages.

25 8. Additionally, I am a half owner of the property located at 6595 La Porte Rd, (Also
26 known as 53 Darby Road), Bangor, CA 95914 ("6595 La Porte Rd") with Travis. 6595 La Porte
27 Road experienced significant tree damage during the La Porte Fire. Our mother left 6595 La Porte
28 Road to both Travis and I when she passed. To facilitate the transfer of title, I filed a quit claim

1 deed in my name and I am now the legal owner of 6595 La Porte Rd.

2 9. My home at 7 Darby Road, where Travis has been living, is infested with rats who
3 are destroying the home. The rats entered 7 Darby Road while fleeing from the La Porte Fire, and
4 all attempts to eradicate the rats have been unsuccessful.

5 10. On or about July 15, 2020, after talking to Laura Gifford, another La Porte Fire
6 victim and SLF client, Travis realized that (i) he and I may have a claim for the tree damages at
7 6595 La Porte Rd and (i) I may have a claim for the smoke and rat infestation damages at 7 Darby
8 Road.

9 11. Due to a misunderstanding and lack of information, I did not timely provide SLF
10 with information and the necessary details to complete my proof of claim. As such, no proof of
11 claim was timely filed on my behalf. However, I have now provided all necessary information to
12 SLF from which they were able to file a proof of claim on my behalf.

13 12. Indeed, on July 17, 2020, SLF filed claim number MNUOX27402[[CSLT#4025#CF]]
14 on my behalf ("Subject Proof of Claim"). A true and correct copy of the Subject Proof of Claim is
15 attached here as Exhibit "1."

16 I declare under penalty of perjury that the foregoing is true and correct. Executed on July __,
17 2020.

18
19
20 
JAMES ROY BEADLES

21 7-29-20
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EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and -
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: Identify the Claim

1. Who is the current creditor?	Beadles, James Roy Name of the current creditor (the person or entity to be paid for this claim)	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: _____ _____ _____ _____	
4. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name <u>Beadles, James Roy</u> Attorney Name (if applicable) <u>Gerald Singleton</u> Attorney Bar Number (if applicable) <u>208783</u> Street Address <u>450 A Street, Fifth Floor</u> City <u>San Diego</u> State <u>California</u> Zip Code <u>92101</u> Phone Number <u>7606971330</u> Email Address <u>SLFBKCorres@slfirm.com</u>	Where should payments to the creditor be sent? (if different) Name _____ Attorney Name (if applicable) _____ Attorney Bar Number (if applicable) _____ Street Address _____ City _____ State _____ Zip Code _____ Phone Number _____ Email Address _____
5. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
6. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Part 2: Give Information About the Claim as of the Date this Claim Form is Filed

7. What fire is the basis of your claim? Check all that apply.	<input type="checkbox"/> Camp Fire (2018) <input checked="" type="checkbox"/> North Bay Fires (2017) <input type="checkbox"/> Ghost Ship Fire (2016) <input type="checkbox"/> Butte Fire (2015) <input type="checkbox"/> Other (please provide date and brief description of fire: _____)
8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.)	Location(s): 7 Darby Road, Bangor CA 95914
9. How were you and/or your family harmed? Check all that apply	<input checked="" type="checkbox"/> Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage) <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Renter <input type="checkbox"/> Occupant <input type="checkbox"/> Other (Please specify): _____ <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Wrongful Death (if checked, please provide the name of the deceased) _____ <input type="checkbox"/> Business Loss/Interruption <input checked="" type="checkbox"/> Lost wages and earning capacity <input checked="" type="checkbox"/> Loss of community and essential services <input type="checkbox"/> Agricultural loss <input checked="" type="checkbox"/> Other (Please specify): Any and all losses recoverable under CA law
10. What damages are you and/or your family claiming/seeking? Check all that apply	<input checked="" type="checkbox"/> Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage) <input checked="" type="checkbox"/> Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage) <input checked="" type="checkbox"/> Punitive, exemplary, and statutory damages <input checked="" type="checkbox"/> Attorney's fees and litigation costs <input checked="" type="checkbox"/> Interest <input checked="" type="checkbox"/> Any and all other damages recoverable under California law <input type="checkbox"/> Other (Please specify): _____
11. How much is the claim?	<input type="checkbox"/> \$ _____ (optional) <input checked="" type="checkbox"/> Unknown / To be determined at a later date

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: Gerald Singleton
Gerald Singleton 2020 17:14 PDT

Email: SLFBKCorres@slffirm.com

Signature

Print the name of the person who is completing and signing this claim:

Name	Gerald Singleton		
	First name	Middle name	Last name
Title	Attorney		
Company	Singleton Law Firm		
	Identify the corporate servicer as the company if the authorized agent is a servicer.		
Address	450 A Street, Fifth Floor		
	Number	Street	
	San Diego	CA	92101
	City	State	ZIP Code
Contact phone	7606971330	Email	SLFBKCorres@slffirm.com

Attach Supporting Documentation (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):

☐ I have supporting documentation.
(attach below)

☒ I do not have supporting documentation.

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- **Fill in all of the information about the claim as of the date this claim form is filed.**
- **If the claim has been acquired from someone else, then state the identity of the last party** who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- **For a minor child, fill in only the child's initials and the full name of the child's parent or guardian.** For example, write *A.B., a minor child (John Doe, parent)*. See Bankruptcy Rule 9037.
- **You may but are not required to attach supporting documents to this form.**
Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. *See* the definition of *redaction* of information below.
- **Do not attach original documents because attachments may be destroyed after scanning.**
- **Question 3.** Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.

- **Question 9.** If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- **Question 10.** This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- **Question 11.** You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at <https://restructuring.primeclerk.com/pge>.

Understand the terms used in this form

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Proof of claim: A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

If by first class mail:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
Grand Central Station, PO Box 4850
New York, NY 10163-4850

If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
850 Third Avenue, Suite 412
Brooklyn, NY 11232

You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):

Chico Service Center
350 Salem Street
Chico, CA 95928

Marysville Service Center
231 "D" Street
Marysville, CA 95901

Napa Service Center
1850 Soscol Ave. Ste 105
Napa, CA 94559

Oroville Service Center
1567 Huntoon Street
Oroville, CA 95965

Redding Service Center
3600 Meadow View Road
Redding, CA 96002

Santa Rosa Service Center
111 Stony Circle
Santa Rosa, CA 95401

Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.

Do not file these instructions with your form
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Electronic Proof of Claim_MNUOX27402[[CSLT#4025#CF]]


Final Audit Report


2020-07-17


Created:	2020-07-17
By:	Prime Clerk E-Filing (efiling@primeclerk.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA8kdGW2EDaD0SNRtQedPoZxYBJQnBFd6x

"Electronic Proof of Claim_MNUOX27402[[CSLT#4025#CF]]" History

 Web Form created by Prime Clerk E-Filing (efiling@primeclerk.com)
2020-07-17 - 0:10:46 AM GMT

 Web Form filled in by Gerald Singleton (SLFBKCorres@slffirm.com)
2020-07-17 - 0:14:28 AM GMT- IP address: 72.192.138.39

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 Signed document emailed to Gerald Singleton (SLFBKCorres@slffirm.com) and Prime Clerk E-Filing (efiling@primeclerk.com)
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